

# Exhibit 1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

**DECLARATION OF IAN GADEA-GUIDICELLI IN SUPPORT OF DEFENDANT  
KEVIN GUTHRIE'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS' MOTION  
FOR A TEMPORARY RESTRAINING ORDER**

I, Ian Gadea-Guidicelli, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct based upon my personal knowledge and review of the relevant records maintained in the ordinary course of business:

1. I am the State Emergency Response Team Chief and Response Bureau Chief. I make this declaration in support of Defendant Kevin Guthrie's response to Plaintiffs' motion for a temporary restraining order. If called as a witness, I could and would competently testify to the matters set forth herein.

2. All facilities, buildings, and paving related to the detention facility at the Dade-Collier Training and Transition Airport are, and will remain, in Collier County, Florida.

3. As shown below, the vast majority of the site, including all buildings and pavement, is located in Collier County. There is a small, unpaved extension of the runway that juts slightly into Miami-Dade County. But that runway extension has not been, and is unlikely to be, used to support facilities or operations at the detention center.



4. All substantial decision-making about the detention facility has occurred at either State offices in Tallahassee, Florida, or on-site in Collier County, Florida.

5. No substantial decision-making about the detention facility has occurred in Miami-Dade County.

Executed on July 21<sup>st</sup>, 2025, in Tallahassee, Florida.



**Ian Paul Gadea Guidicelli**

Ian Gadea-Guidicelli, SERT Chief